

NATALIA D. ASBILL-BEAROR, SBN 281860
natalia@perkinsasbill.com
ROBIN K. PERKINS, SBN 131252
robin@perkinsasbill.com
PERKINS ASBILL, APLC
707 Commons Drive, Suite 201
Sacramento, CA 95825
Telephone: 916.446.2000
Facsimile: 916.446.6400

Attorneys for Plaintiff KELLY BRIGHT

JESSE A. CRIPPS, SBN 222285
jcripps@gibsondunn.com
MEGAN M. LAWSON, SBN 294397
mlawson@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
333 South Grand Avenue
Los Angeles, CA 90071-3197
Telephone: 213.229.7000
Facsimile: 213.229.7520

Attorneys for Defendant
AMERICAN HOME SHIELD CORPORATION

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

KELLY BRIGHT,

Plaintiff,

v.

AMERICAN HOME SHIELD
CORPORATION, a Delaware corporation,

Defendant.

CASE NO. 2:20-CV-02079-KJM-CKD

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR DEFENDANT
TO FILE RESPONSIVE PLEADING**

1 Plaintiff Kelly Bright and Defendant American Home Shield Corporation hereby submit a
2 joint stipulation to extend the time for Defendant American Home Shield Corporation to file its
3 responsive pleading to the complaint as follows:

4 WHEREAS, Plaintiff filed a Complaint in this Court on October 16, 2020 (Dkt. No. 1) (the
5 “Action”);

6 WHEREAS, the Parties previously agreed to extend the time for Defendant’s responsive
7 pleading to twenty-eight (28) days following the conclusion of the Voluntary Dispute Resolution
8 Program (“VDRP”) (Dkt. Nos. 8, 9);

9 WHEREAS, the parties participated in the VDRP session on March 2, 2021, but the session
10 did not result in resolution of this action;

11 WHEREAS, the parties agreed to further extend the time for Defendant’s responsive pleading
12 by seven (7) days, to April 6, 2021, which was entered by the Court (Dkt. No. 15);

13 WHEREAS, the parties met and conferred regarding Defendant’s anticipated motion to
14 compel arbitration and agree that additional time is needed in order to determine whether they can
15 resolve the matter without motion practice; and

16 WHEREAS, this stipulation is the fourth extension by the parties regarding Defendant’s
17 responsive pleading and made in response to the parties’ desire to continue to meet and confer
18 regarding Defendant’s anticipated motion to compel arbitration and to stay this action, in order to
19 determine whether they can resolve the matter without motion practice;

20 THEREFORE, IT IS STIPULATED AND AGREED THAT, by and between the undersigned
21 counsel, Defendant will file its motion to compel arbitration of this Action, on or before April 9,
22 2021.

23 //

24 //

25 //

26 //

27 //

1 Dated: April 12, 2021

2 NATALIA D. ASBILL-BEAROR
3 ROBIN K. PERKINS
4 PERKINS ASBILL, APLC

5 By: /s/ Natalia D. Asbill-Bearor
6 Natalia D. Asbill-Bearor
7 Attorneys for Plaintiff Kelly Bright

8 JESSE A. CRIPPS
9 MEGAN M. LAWSON
10 GIBSON, DUNN & CRUTCHER LLP

11 By: /s/ Jesse A. Cripps
12 Jesse A. Cripps
13 Attorneys for Defendant
14 AMERICAN HOME SHIELD CORPORATION

15 IT IS SO ORDERED.

16 DATED: April 12, 2021.

17 
18 _____
19 CHIEF UNITED STATES DISTRICT JUDGE
20
21
22
23
24
25
26
27
28